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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NAVAJO HEALTH FOUNDATION – SAGE
MEMORIAL HOSPITAL, INC. (doing
business as “Sage Memorial Hospital”); an
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,
LLC; a Nevada limited liability company
(doing business as “Razaghi Healthcare”),
AHMAD R. RAZAGHI; individually, TAUSIF
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND
TIME FOR RESPONSE TO THIRD-
PARTY COMPLAINT AND
COUNTERCLAIMS
(FIRST REQUEST)**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and the Court's Local Rule of Civil Practice 7-2, Counter-Defendant (Navajo Health Foundation – Sage Memorial Hospital, Inc.), Third-Party Defendants (Christi El-Meligi and Netrishia Dalgai) and Counter-Claimant (Razaghi Development Company, LLC or "RDC")) hereby stipulate to permit Counter-Defendant and Third-Party Defendants additional time, to and until September 4, 2020, to respond to the Third-Party Complaint and Counterclaims asserted by RDC. The parties respectfully request the Court approve this stipulation. This is the parties' first stipulation for the purpose set forth herein. In requesting the Court approve this stipulation, the parties rely upon the following:

1. Counter-Claimant RDC filed a Third-Party Complaint and Counterclaim on July 23, 2020. *See* ECF No. 67.
2. The parties have communicated regarding this matter. Counsel (Paul S. Padda, Esq.) for Third-Party Defendants and the Counter-Defendant has explained to RDC counsel that, due to competing case commitments, additional time will be needed to respond to the Third-Party Complaint and Counterclaim. Specifically, undersigned counsel Paul S. Padda (who is taking the lead on this matter for the responding parties) will be required in the upcoming week to respond to discovery in two other civil matters and prepare a complaint for filing in a significant civil rights case involving a wrongful death. Additionally, during the past week, undersigned counsel for the Third-Party Defendants and the Counter-Defendant was required to travel out of town for a business matter and was also required to prepare a response to a dispositive motion in a state civil case. Given this schedule, undersigned counsel for the responding parties has not had sufficient time to complete an appropriate response.

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1 3. In light of the foregoing, the parties agree that additional time, up
2 to and including September 4, 2020, for Third-Party Defendants and Counter-Defendant to
3 respond to RDC's additional pleadings is appropriate.

4 4. The parties respectfully request the Court approve this stipulation.

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7 */s/ Brian L. Bradford*

/s/ Paul S. Padda

8 _____
9 Pavneet S. Uppal, Esq.
10 Kris Leonhardt, Esq.
11 Brian L. Bradford, Esq.

Kathleen Bliss, Esq.
Paul S. Padda, Esq.
David Stander, Esq.
Douglass A. Mitchell, Esq.

Counsel for Razaghi Development Company, LLC

*Counsel for Christi El-Meligi,
Netrisha Dalgai and Navajo Health
Foundation – Sage Memorial
Hospital, Inc.*

12 Dated: August 24, 2020

Dated: August 24, 2020

16 **IT IS SO ORDERED:**

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18 _____
19 **UNITED STATES MAGISTRATE JUDGE**

20 **DATED:** August 25, 2020
21 _____